III. REMARKS

Claims 1-2 and 4-39 are pending in this application. By this amendment, claims 1, 4, 11, 18, 21, 29, and 32 have been amended; claim 3 has been canceled. Applicants are not conceding in this application that those claims are not patentable over the art cited by the Office, as the present claim amendments and cancellations are only for facilitating expeditious prosecution of the subject matter noted by the Office. Applicants do not acquiesce in the correctness of the rejections and reserve the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicants reserve the right to pursue the full scope of the subject matter of the original claims in a subsequent patent application that claims priority to the instant application. Reconsideration in view of the following remarks is respectfully requested.

In the Office Action, claims 18-28 are rejected under 35 U.S.C. § 101, as allegedly being directed to non-statutory subject matter. The Office indicates that these claims are directed to a system for protecting a distributed application user and asserts that the claimed subject matter does not fall within the statutory classes listed in 35 U.S.C. § 101. More specifically, the Office asserts that these claims allegedly recite a security, association, and command checking system, defined in the specification to be implemented through software and therefore, the recited claims are directed to functional descriptive material. Applicants have amended claim 18 to disclose "a computer device including" and contend that claim 18, as amended, complies with the Office's interpretation of statutory subject matter. Accordingly, Applicants request that the Office withdraw this rejection.

In the Office Action, claims 1-39 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Levergood et al. (US 5,708,780) in view of Applicant's own alleged admitted prior art (AAPA). Applicants traverse the rejection on the following grounds.

With respect to independent claims 1, 11, 18, and 29, Applicants assert that Levergood in view of AAPA does not disclose each and every feature of the claimed invention. For example, Levergood in view of AAPA does not disclose, *inter alia*, "generating a security value for an authenticated user of the distributed application, wherein every user is authenticated prior to generating the security value and the security value is a pseudo-random number," as recited in claim 1 and similarly recited in claims 11, 18, and 29.

First, Applicants assert that Levergood does not disclose the security value of the claimed invention. The Office cites to Col. 5, lines 41-64 and Col. 6, lines 53-Col. 7, lines 13 of Levergood and asserts that the "SID is generated for an authenticated user." See, Office Action, page 3. Applicants understand that the Office is pointing to the SID of Levergood as allegedly disclosing the security value of the claimed invention. However, Applicants respectfully disagree. The paragraph in Col. 5 of Levergood is directed towards what occurs in the invention if a request is "directed to a controlled page." Therefore, prior to this, it must be determined whether the request is directed to a controlled page or an uncontrolled page. Levergood discloses that the requests are partitioned into two separate groups. As such, Levergood does not disclose every feature of the claimed invention; the claimed invention requires every user to be authenticated.

Applicants also contend that Levergood does not teach the security value of the claimed invention because Levergood provides that it is determined whether the URL contains an SID.

This entails that the SID may already exist. However, Applicants claimed invention discloses that a security value is generated for the authenticated user, after the user is in fact authenticated. Moreover, Applicants assert that Levergood does not provide the SID to be a pseudo-random number. Accordingly, Applicants maintain that the cited references do not teach or suggest each and every feature of the claimed invention.

Second, Applicants assert that the Office cites to the same feature of Levergood as allegedly teaching the authentication of the user, the generating of the security value for the authenticated user, and checking the one URL/command for the security value. See Office Action, pages 3-4 (Office cites to Col. 5, lines 41-49 of Levergood). Applicants maintain that this assertion by the Office does not hold. If this section of Levergood, which discloses "determines whether the URL contains an SID 102," teaches authentication of the user, Applicants assert that it is not logical for it to also teach generating the security value for the authenticated user and checking the command for the security value. Accordingly, Applicants assert that independent claims 1, 11, 18, and 29 are in condition for allowance.

With regard to the Office's other arguments regarding dependent claims, Applicant herein incorporates the arguments presented above with respect to independent claims listed above. In addition, Applicant submits that all dependant claims are allowable based on their own distinct features. However, for brevity, Applicant will forego addressing each of these rejections individually, but reserves the right to do so should it become necessary. Accordingly, Applicant respectfully requests that the Office withdraw its rejection.

However, if the Office wishes to maintain these rejections, Applicants request that the Office further clarify how Applicants' claimed invention is unpatentable in view Levergood in

view of AAPA. Applicants request that the Office clarify where Levergood specifically provides that a user is authenticated. Also, Applicants request that the Office indicate where in Levergood is it provided that every user is authenticated. Applicants further request that the Office clarify how Levergood teaches generating a security value that is a pseudo-random number.

IV. CONCLUSION

In light of the above, Applicant respectfully submits that all claims are in condition for allowance. Should the Examiner require anything further to place the application in better condition for allowance, the Examiner is invited to contact Applicant's undersigned representative at the number listed below.

Respectfully submitted,

Date: June 12, 2008

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